

file

NOV 19 1998

Ms. Kay Tauscher
Safety-Kleen, Inc.
5665 Flatiron Parkway
Boulder, Colorado 80301

Dear Ms. Tauscher:

RE: Safety-Kleen Wichita
Wichita, Kansas
EPA RCRA ID Number: KSD007246846

The following comments apply to the Draft RCRA Facility Investigation (RFI) Work Plan for the above facility dated August 3, 1998. These comments are based on Environmental Protection Agency (EPA)'s review of the document, the site visit/meeting which took place on September 15, and information provided by the Kansas Department of Health and Environment (KDHE). Please respond to these comments and submit a revised work plan by December 31, 1998.

GENERAL:

1. **The Work Plan** is based on the idea of using soil sampling data from the first stage of the RFI to locate appropriate groundwater sampling areas for investigation in the second stage. An alternative approach would be to use groundwater sampling data from the first stage to target the most likely soil source areas for investigation in the second stage. Previous investigations have indicated the presence of chlorinated solvents in soil and soil vapor on site and in the groundwater immediately downgradient of the facility. KDHE therefore concludes that this facility is a probable source area of contamination in the North Industrial Corridor (NIC), although KDHE also notes that it is difficult to locate source areas in the Arkansas Alluvium through soil sampling alone. Given the above information, it seems likely that Safety-Kleen will need to develop or produce a considerable amount of soil and groundwater data in order to characterize the nature and extent of site contamination. Safety-Kleen should consider what is the best way to provide or develop the needed site characterization information, irrespective of prior notions concerning staging.
2. **Based on groundwater elevation data for the NIC site**, KDHE believes the general groundwater flow direction at the Safety-Kleen facility is toward the southeast, although the actual direction may vary at different locations across the property. For each

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SWMU/AOC, the local groundwater flow direction should be considered, along with other factors and constraints, in selecting soil sampling locations most likely to reveal releases from source areas. The revised work plan should include groundwater flow contour lines (e.g., in Figure 4) to assist in locating soil sampling points downgradient of SWMUs/AOCs. Also, the work plan (e.g., in Table 4 or in an additional table) should discuss the basis for locating the specific sampling points. (That is, whether the sampling location was chosen on a grid or SWMU-specific basis, and the extent to which physical or other constraints prevent sampling at the theoretical optimum location for detecting releases.)

SPECIFIC:

1. **Page 1, 4th Paragraph:** KDHE has expressed concern that some contaminants may not be detected in soil samples adjacent to the source of contamination because the contaminants migrate directly down to groundwater. For this reason, please note that some groundwater sampling may be required regardless of the findings of the first stage of the Phase I study. In addition, the wording "Should releases be identified..." seems to disregard the findings of several documents and studies that suggest or confirm the existence of chlorinated organics in numerous soil samples at the facility. (See the attached documents.) The basic objective of the RFI is to characterize and determine the horizontal and vertical extent of facility releases. It may be necessary to conduct the RFI in two or more stages to accomplish this objective. However, it may not be necessary or desirable to delay the investigation of known releases to the second stage. On one of the drawings in your revised RFI work plan, please display both the proposed sampling locations for the first stage sampling and also the location of all previous soil samples which have confirmed or suggested the presence of contaminated soil. Such a display should allow Safety-Kleen and the regulatory agencies to make better choices for the final first stage sampling locations, and to ensure that the proposed investigation covers all potential source areas implicated by previous investigations.
2. **Page 3, Last Paragraph:** The text should be revised to clarify that a Phase I RFI report will be submitted following the completion of Phase I field work. A separate Phase II investigation and RFI report will be required at a later date.
3. **Page 5, Section 3.4:** As used in this paragraph, the word "site" appears to refer both to the Safety-Kleen facility and to the North Industrial Corridor (NIC). Please revise the text to clarify the references.
4. **Page 9, Section 5.1.1:** The text indicates that a subsurface utility survey will be conducted prior to the final placement of soil boring locations. However, the text does not indicate how the boring locations will be adjusted (i.e., will there be an effort to sample or to avoid sampling in these areas). Special care may need to be exercised when sampling in or near subsurface utility corridors, but it is often appropriate to sample in these areas because they can be preferential flow pathways.

5. **Page 10, Top of the Page:** The text notes that sampling locations may be moved up to 35 feet away from the planned location. The Phase I RFI report should discuss the rationale for relocating any sampling locations, and should establish that to the extent practicable, all samples related to a specific unit (i.e., not the grid samples planned for the southwest corner of the property) are taken from the location(s) most likely to reveal the presence of contamination from the unit.
6. **Page 10, Section 5.1.3.2:** Refer to Comment 4 above. The second sentence in this section does not indicate whether the specified conditions (infrastructure, obstructions, cracks, etc.) will be sought or avoided.
7. **Page 11, Section 5.1.3.4:** The second sentence of the second paragraph should be modified to indicate that the goal of Stage 1 is to identify for each SWMU/AOC the areas with the greatest potential for release.
8. **Page 11, Section 5.1.3.5:** The meaning of the term "maximum number of samples" in the fourth step is unclear, as discussed during the September 15th meeting.
9. **Page 14, Section 6.2:** This section indicates that background soil data will definitely be used to compare against the Phase I soil samples. Section 5.1.3.4 indicates that background sampling will be optional. Unless some NIC report provides satisfactory facility background information, it appears that some background sampling will be necessary and the discrepancy between these two sections should be reconciled.
10. **Page 16, Section 6.5:** With regard to the fifth bullet, refer to Comment 9.
11. **Page 19, Section 7.1.2:** The first two bullets state that samples must be representative of the media to be evaluated and must reflect the concentrations of hazardous constituents present. The underlying assumption is that a sufficient number of samples will be taken near each SWMU/ AOC to meet these two criteria. As discussed during the September 15th meeting, additional sampling locations should be proposed to provide better coverage of some specific SWMUs and the open area in the southwest portion of the facility.
12. **Page 27, Section 7.4:** The term "corrective action" has special meaning under the Hazardous and Solid Waste Amendments permit. Use of the same term with respect to QA/QC procedures may lead to some confusion. Please modify this section to remove the prospect of confusion.
13. **Table 1:** The "*" footnote contains some faulty logic. The justification for delaying the investigation of some SWMUs to Phase II is not based on recent improvements to minimize future releases. The basis for delay was the agreement that some SWMUs should not be investigated until closure of the facility or the unit.

14. **Table 3:** Please include the SWMU or AOC identification number along with the SWMU name, and rearrange the SWMUs in the same order as Table 1.
15. **Figure 4: Refer to Comment 11 above.** As discussed during the September 15th site visit, additional sampling locations should be proposed to cover the points of access from Buildings C, D, I, and J to the railroad spur running east-west across the northern part of the facility. Also, additional soil samples should be provided for the loading dock to the south of Building J. The loading dock has been enlarged from its historical size, and the single sample point at B-22 does not cover all the areas likely to have been affected by potential spills associated with the dock. In addition, note that KDHE requests additional soil and groundwater samples downgradient of Buildings I and J. Even though there may not be any known releases in this area, these buildings were historically used for solvent distillation, storage, and distribution at a time when releases were not documented as rigorously as current standards require. Another item discussed on September 15th was the need to provide an area sampling grid for the open area in the southwest portion of the site.
16. **The agreement to delay the investigation of some SWMUs in Table 1** was based on the difficulty or physical inability to take subsurface samples from directly beneath these areas until the unit or the facility ceased operation. However, while it may be impracticable to sample directly beneath these units until a later date, it should be possible to sample fairly close to these units. The Work Plan should be revised to add sample locations to cover the access points along the south side of Building C and the associated drum dock. These sample locations should complement and should be coordinated with any previous sampling done in this area.
17. **Appendix A:** The raw sampling data in Appendix A is of limited use because there is no spatial frame of reference for the information. Please provide a separate scaled drawing of the former buried paint can pit, showing its relation to the nearby fence line and the corrosive waste storage building, along with the location of all post-excavation soil samples for this unit and the summarized analytical results for each location. The data contained in Appendix A indicate that the concentrations of contaminants in the liquid and solid samples collected from the pit are high enough to have acted as a source of groundwater contamination. Since the information in the work plan was insufficient to determine whether this potential source area was fully delineated and completely removed, additional soil and/or groundwater samples may be required. Note that KDHE requires analysis of total contaminants (vs. TCLP) for confirmation sampling such as was done at the buried paint can pit.

Additional comments may be offered concerning the Quality Assurance Project Plan. However, you should still address these comments by the date noted above. If you have any questions, please call me at (913) 551-7632.

Sincerely,

Elbridge W. Bartley, III
RCRA Corrective Action and Permits Branch
Air, RCRA, and Toxics Division

Enclosures

cc: David Cox, KDHE/BWM (w/o encl)
Chris Jump, KDHE/BER (w/o encl)

bcc: Brad Vann, RCAP (w/o encl)

David Cox
Kansas Dept. of Health and Environment
Forbes Field, Building 740
Topeka, Ks. 66620-0001

Chris Jump
Kansas Dept. of Health and Environment
Forbes Field, Building 740
Topeka, Ks. 66620-0001



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
726 MINNESOTA AVENUE
KANSAS CITY, KANSAS 66101

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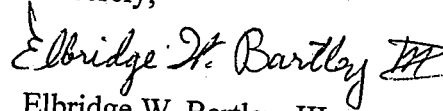
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Air, RCRA, and Toxics Division

Enclosures

cc: David Cox, KDHE/BWM (w/o encl)
Chris Jump, KDHE/BER (w/o encl)

DRAFT

TRIP REPORT

HYDROCARBON RECYCLERS, INC.
WICHITA, KANSAS

RECEIVED

OCT - 5 1998

BUREAU OF
ENVIRONMENTAL
REMEDATION

INTRODUCTION

PRC Environmental Management, Inc. (PRC), received work assignment number R07015 (TES 9) from the U.S. Environmental Protection Agency (EPA). The assignment is to conduct a Resource Conservation and Recovery Act (RCRA) facility assessment (RFA) at the Hydrocarbon Recyclers, Inc. (HRI), facility in Wichita, Kansas. PRC conducted a sampling visit (SV) at the HRI facility from January 8 through 10, 1992. The SV consisted of collecting soil and soil gas samples and subjecting them to field analytical screening (FAS) to determine if a release of hazardous constituents from Solid Waste Management Units (SWMUs) or Areas of Concern has occurred. Select samples were submitted to the EPA Region VII Laboratory for formal level IV analysis to confirm FAS data. This trip report outlines the field work completed, deviations to the EPA-approved facility assessment sampling plan dated January 6, 1992, and any observations made during the sampling event.

FIELD WORK

The PRC field team consisted of: Eric Hess, Project Manager; Wes McCall, Lead Chemist; Brad Helland, Assistant Chemist; and Keith Brown, Sampler. HRI representatives were: Bret Morton, Director of Regulatory Affairs; Ron Robertson, Safety Briefing Officer; Carol Murphy, Environmental Compliance Officer; and David Trumbel, Site Manager; Mark Matthews, EPA Work Assignment Manager.

A total of 14 soil gas samples were collected with the Geoprobe unit and screened for VOCs with PRC's on-site mobile laboratory. Table 1 lists the soil gas samples and their respective locations.

A total of 13 soil samples were collected. After screening, seven soil samples, one rinsate sample, two trip blanks, and one decontaminated water sample were submitted to the EPA Region 7 Laboratory for analysis on January 15, 1992. All samples were submitted for analysis of volatile organics; one soil sample (SS-10) was submitted for semivolatile analysis. This sample was selected for additional analysis because elevated concentrations of chlorinated solvents, relative to the other samples. Table 2 lists the soil samples and their respective locations.

SAMPLING PLAN DEVIATIONS AND OBSERVATIONS

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Sampling conditions and unexpected problems during field work caused several deviations in the anticipated scope of work as outlined in the EPA approved sampling plan dated January 6, 1992. The deviations are as follows:

- The flame ionization detector (FID) failed to operate upon arriving at the site and was replaced with the photoionization detector (PID). The PID will reduce sensitivity to certain non-chlorinated compounds. This will not affect the sampling plan since it is only necessary to show that a release is present. The electron capture detector (ECD) functioned properly.

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Mr. Robertson, HRI, told PRC that the Dry Solids Gondola is not in the center of the turn-around isle as described in the RFA report it is about 150 feet east of the turnaround. The soil in this area was disturbed, and sampling was shifted to this area.

- Sampling was conducted along the entire length of the drum storage warehouse (building C) on the south side. A historical site photograph noted this entire area as being a drum holding area.
- Soil sample 11 (SS-11) was taken between the Warm Room and the Processing Building. This sample was added to allow sampling around a former solvent still. Sampling was not possible under the still area due to access difficulty. This sample was collected along the SW edge of the former still area.
- Union Pacific Railroad declined access to sample the upgradient groundwater points identified in the sampling plan. Therefore no groundwater samples were collected for analysis.
- Only one semi-volatile soil sample was submitted for confirmatory analysis because it exhibited high concentrations of chlorinated compounds.
- The project sample delivery date was January 15 instead of January 13, 1992. This was due to the time needed to complete the sample screening.

SUMMARY

PRC screened 13 soil samples for volatile organics and delivered 7 soil samples to the EPA Region 7 Laboratory for formal in-house analysis on January 15, 1992. All samples will be analyzed for volatile organics and one sample for semi-volatile organics on a standard-priority basis.

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The next step in this work assignment will involve preparing a data summary.

TABLE 1

SOIL GAS SAMPLING LOCATION

Boring	Location
SG-1	NW corner of site, outside SW corner of building C, ~25 feet east of SW building C entrance.
SG-2	NW corner of site, outside SW corner of building C, ~50 feet east of SG-1.
SG-3	NW corner of site, outside south central face of building C, ~60 feet east of SG-2.
SG-4	NW corner of site, outside SE corner of building C, outside SE corner of loading ramp and outside SW corner of drum staging area, ~100 feet east of SG-3, ~50 feet west of SG-5.
SG-5	NW corner of site, outside SE corner of building C, outside south-central face of Drum Staging area, ~50 feet east of SG-4, ~50 feet west of SG-6.
SG-6	NW corner of site, outside SE corner of building C, outside SE corner of Drum Staging area, ~50 Feet east of SG-5.
SG-7	NE corner of site, outside NW corner of building I, south of gate near perimeter fence.
SG-8	NE corner of site, outside northern face of building I, ~40 feet east then ~36 feet north of SG-7.
SG-9	NE corner of site, outside NE corner of building I, ~40 feet north of corner and due east of SG-8.
SG-10	Extreme NE corner of site, west side of former Underground Storage Tank location.
SG-11	SW corner of site, ~65 feet north of SG-12, ~11 feet west of fence.
SG-12	Extreme SW corner of site, ~15 feet NE of the SW corner perimeter fence.
SG-13	SW corner of site, ~78 feet east of SG-12, ~11 feet north of fence, south of soil piles.

TABLE 2
SOIL SAMPLING LOCATION

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ring	Location
S-1	NE corner of site, outside northern face of building I, south of gate near perimeter fence.
S-2	NE corner of site, outside northern face of building I, ~10 feet East of SS-1.
S-3	NE corner of site, outside NE corner of Vault.
S-4	NE corner of site, outside west face of Vault, just outside perimeter fence, ~2 feet west of crack.
SS-5	West-central area of site, south of Loading Ramp in turn-around, Dry Solids Gondola east end.
SS-6	West central area of site, south of Loading Ramp in turn-around, Dry Solids Gondola west end.
SS-7	NW corner of site, outside SE corner of building C, outside SE corner of Drum Staging area, ~50 feet east of SG-5.
SS-8	NW corner of site, outside SE corner of building C, outside south-central face of Drum Staging area, ~50 feet east of SG-4, ~50 feet west of SG-6.
SS-9	North-central area of site, between outside building D and outside SE corner of process area building. north of Drum Crusher.
SS-10	North-central area of site, between outside building D and outside SE corner of Process Area building. south of Drum Crusher.
SS-11	NW corner of site, outside SE corner of Warm Room building.
SS-12	Extreme SW corner of site, ~15 feet NE of the SW corner perimeter fence.

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TABLE 3

SOIL GAS SAMPLE SUMMARY

<u>Sample No.</u>	<u>Date</u>	<u>Time</u>	<u>Depth (in)</u>	<u>Comments</u>
SG-1	01/08	1530	84	Bulb, background reading
SG-1t	01/08	1535	84	Tedlar
SG-2	01/08	1642	66	Bulb, 1ppm greater-than background
SG-3	01/09	0920	82	No PID reading
SG-4	01/09	0945	83	PID 0.3 ppm
SG-5	01/09	1002	81	Microtip 40.5, HNU 3.5
SG-6	01/09	1030	82	Microtip 5.0, HNU 1.0
SG-7	01/09	1100	81	Microtip 200, HNU 27
SG-8	01/09	1534	84	Microtip 28.0, HNU 28,
SG-9	01/09	1511	53	Microtip 16.0, HNU 10
SG-10	01/09	1645	36	Microtip 16.5, HNU 1
SG-11	01/10	1430	30-78	Microtip 4.5, Bulb #9
SG-12	01/10	1445	30-78	Microtip 9.7, Bulb #6
SG-13	01/10	1530	30-78	Microtip 0.7, Bulb #8

TABLE 4
SOIL SAMPLE SUMMARY

Sample No.	Time	Depth (in)	Comments
SS-1	1002	0-24	W of SG-e, NE area of site
SS-2	1030	6-36	Microtip 5, 7.5' SE of SS-1
SS-3	1105	66-90	Microtip 0, NE edge of vault
SS-3D	1105	66-90	Microtip 0
SS-4	1115	66-90	Microtip 0.5, NW edge of vault
SS-5	1205	6-36	No Microtip, E end of Gondola
SS-6	1220	6-36	Microtip 30 W end of Gondola
SS-7	1240	6-36	Microtip 22, SG-6, NW area
SS-8	1300	6-36	Microtip 28+
SS-9	1600	6-42	Microtip 4000, depth below concrete
SS-10	1615	6-42	Microtip 450, depth below concrete
SS-11	1700	6-42	Microtip 38+, Depth below concrete
SS-12	1725	6-30	Microtip 6.4, SW open area of site
Other	1800		Rinsate of sampler for SS-9
Other	1810		Decontaminated Water
Other	1825		Trip Blank

Note:

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TABLE 5
SOIL GAS SAMPLES
FIELD ANALYSIS
AROMATIC COMPOUNDS (PID)

Sample No.	ANALYTES		
	M & P-Xylene (ng/L)	O-Xylene (ng/L)	Unknown Aromatics (ng/L)
SG-1	ND0	ND0	10300
SG-2	0	0	ND
SG-3	0	0	13600
SG-4	0	0	ND
SG-5	0	0	ND
SG-6	0	0	7850
SG-7	0	0	ND
SG-8	9640	13200	150000
SG-9	ND0	ND0	ND
SG-10	0	0	ND
SG-11	0	0	32800
SG-12	0	0	42900
SG-13	0	0	19400

Notes:

ND No concentrations of Benzene, Toluene, and Ethyl Benzene were detected in the soil gas samples. Detection Limit = 6 ng/L.

Unknown Aromatic compound concentrations are calculated relative to the toluene response factor.

ND = Not Detected. Detection Limits: M+P-Xylene and O-Xylene = 6 ng/L. Not possible to determine detection limit for unknowns

TABLE 6

SOIL GAS SAMPLES
HEADSPACE FIELD ANALYSIS (ECD)

DRAFT

Sample No.	ANALYTES					Total
	CHCl ₃ (ng/L)	TCA (ng/L)	CCl ₄ (ng/L)	TCE (ng/L)	PCE (ng/L)	
SG-1	24614	ND	1313	3441	ND	29368
SG-2	65	ND	47	64	0	176
SG-3	3008	403	29196	5361	0	37968
SG-4	29536	ND	12436	15930	0	57902
SG-5	27520	ND	4348	39462	0	71330
SG-6	21164	ND	632	60201	91	82088
SG-7	0	83.1	122	189	ND	394.1
SG-8	26793	ND	23106	51787	0	101686
SG-8D	13923	0	0	49130	0	63050
SG-9	168	0	65	144	123	500
SG-10	3227	0	1014	17635	11.1	21887.1
SG-11	1110	0	36800	43300	ND	81210
SG-12	115	0	12700	54400	0	67215
SG-13	2630	0	204	54400	0	57234

ND = Not Detected. Detection limit for the
chlorinated VOCs = 1 ng/L.

TABLE 7
SOIL SAMPLES
HEADSPACE FIELD ANALYSIS (ECD)

Sample No.	ANALYTES				
	CHCl ₃ (ppb)	TCA (ppb)	CCl ₄ (ppb)	TCE (ppb)	PCE (ppb)
SS-1	4.7	ND	160	75.4	< ND
SS-2	151		1160	104	<
SS-2D	130		1200	105	<
SS-3	tr		tr 2.2	tr 1.1	<
SS-4	tr		< ND	tr 1.0	<
SS-5	6.1		< ND	577	<
SS-6	tr 4.2		tr 1.2	24	tr 1.8
SS-7	177		24.1	2770	< ND
SS-7*	377	89	115	4460	36.3
SS-8	144	< ND	9.2	820	< ND
SS-9	8560	2400	5190	2520	<
SS-10	1490	< ND	14700	15300	<
SS-11	128	<	329	1300	<
SS-12	tr 1.1	<	27.4	1010	tr 3.4

Notes:

Submitted to EPA laboratory for confirmation of analysis.

Unknown aromatic compound concentrations are calculated relative to the Toluene response factor.

ND = Not Detected, Detection limit for the chlorinated VOCs = 5 ppb. (mg/kg)

tr = trace: below established detection limit but trace observed on chromatogram.

TABLE 8

TABLE 8
HEADSPACE FIELD ANALYSIS
AROMATIC COMPOUNDS (PID)

DRAFT

ANALYTES

Sample No.	Benzene (ppb)	Toluene (ppb)	Ethyl Benzene (ppb)	M & P Xylene (ppb)	O-Xylene (ppb)	Unknown Aromatics (ppb)
Blank	0 ND ^x	0 ND	0 ND	0 ND	0 ND	0 ND
SS-1	0	0 ND	0 1	0 1	0 1	0 1
SS-2	0	321.4	485.7	786	1504	1930
SS-3	0	0 ND	0 ND	0 ND	0 ND	0 ND
SS-4	0	0	0 1	0	0	0 1
SS-5	0	0	0 1	0	0	0 1
SS-6	0	55.1	trace	112	86	121
SS-7	0	0 ND	0 ND	0 ND	0 ND	394
SS-8	0	0	0	0	0	546
SS-9	0	0	0	0	0	0 ND
SS-10	0	0	0	0	0	0
SS-11	0	0	0	0	0	0
SS-12	0	0	0	0	0	0
						227

Notes:

Detection limit for aromatic components is ⁵⁰25 ppb.

DRAFT

trace is below established detection limit but trace observed on chromatogram.

FIELD SCREENING DATA Summary

QA/QC

HYDROCARBON RECYCLERS INCORPORATED DATA SUMMARY

Soil gas analyses were conducted for chlorinated and aromatic volatile compounds. The chlorinated compounds were standardized using 1 ppb, 5 ppb, and 10 ppb (parts per billion) standards with initial relative percent differences (RPD) ranging from 9.1% to 22.2%. The aromatic compounds were standardized using 10ppb, 50ppb, and 100 ppb standards with initial RPDs ranging from 24.3% to 28.9%. A duplicate was analyzed for soil gas sample 008. The duplicate relative percent differences (RPD) for m/p-xylene and o-xylene were 39.6% and 26.0% respectively. Benzene, toluene, ethyl benzene, 1,1,1-TCA and PCE were not detected in sample 008. The duplicate RPDs for chloroform, carbon tetrachloride, and TCE were 63.0%, 31.0% and 5.3% respectively.

A matrix spike analysis was conducted on soil sample xxx to constrain potential matrix effects. The percent recovery (%R) for the aromatic compounds ranged from 90.2% to 199%. A larger variation in %R was observed for the chlorinated compounds. The recovery for TCE was over 1000% percent and may indicate matrix inhomogeneity. The %R for the other four chlorinated analytes ranged from 36.3% to 199%. No matrix spike analyses were conducted for the soil gas samples.

determine

DRAFT

SS7

→ were these
w/ than acceptable FAS SOG limits
except TCE

AROMATICS

1. soil Gas

2. soil

Rolf

FYI

Chlorinated Volatile Organics

1. soil Gas

2. soil

WLB

MEMORANDUM

SUBJECT: PRC's Review Comments on HRI's Part B Application
Regarding Air Emission

FROM: Katherine Bello

TO: Mark Matthews

I have looked over PRC's review of HRI's Part B information on meeting the air emission standards described in Subpart AA and BB. It appears to be thorough and complete.

As PRC mentioned, there is some equipment (namely compressors) which HRI should document as to why they are not subject to Subpart BB. Also, HRI mentions "condensors and vent lines". Again, HRI should document why these vents are not subject to Subpart AA.

Also, does HRI do any recycling on-site? Although they are not RCRA regulated, these recycling operations are subject to Subparts AA and BB (see 264.1030(b)(2)). Perhaps, this is where the compressors, condensors and vents are situated? If they do have recycling operations with vents subject to Subpart AA, HRI will need to submit substantially more documentation regarding compliance with Subpart AA.

Although not in effect yet, you may also want to consider the proposed standards in Subpart CC for air emissions from tanks and containers when permitting HRI (?).

JAN 03 1992

Brett Morton
Director of Regulator Affairs
USPCI
4200 Pennsylvania
Kansas City, Missouri 64111

RE: Sampling at Hydrocarbon Recyclers, Inc., Wichita, Kansas

Dear Mr. Morton:

This letter is a follow-up to phone conversations between yourself and Mark Matthews, of my staff. As discussed previously, the Environmental Protection Agency (EPA) has directed its contractor, PRC, to complete a sampling visit at the above referenced facility. The sampling visit is designed to fill data gaps in the draft Resource Conservation and Recovery Act (RCRA) Facility Assessment (RFA) report. Specifically, the sampling results should tell us whether there have been releases of hazardous wastes or hazardous constituents to the environment from some of the areas identified in the draft RFA. We appreciate the cooperation you and your company's personnel have shown in the planning of this sampling event.

PRC will arrive at the facility on the morning of January 8 and plan to be there through January 10. The following people will make up the PRC sampling team: Eric Hess - Team Leader, Wes McCall - Safety Officer, Brad Helland - Chemist, Keith Brown - Geoprobe Operator, and John Nett - Documentation (Black & Veatch Waste Science and Technology Corp.). Mark Matthews plans to be present on January 9 and 10. Our intention is to disrupt operations at the facility as little as possible.

If you have any questions, feel free to call Mark Matthews at (913) 551-7635. Thank you again for your cooperation in this effort.


Sincerely yours,

Lyndell Harrington
Chief, RCRA Permits Section

54
THE WICHITA-SEDGWICK COUNTY DEPARTMENT OF COMMUNITY HEALTH

OFFICE OF Environmental Health

DATE December 31, 1980

TO  John Paul Goetz, P.E., Hazardous Waste Management Section, Kansas Department
of Health and Environment

FROM Michael J. Everhart, Environmental Quality Coordinator

SUBJECT Reid Supply

On October 31, 1980, I visited the Reid Supply Company storage area at 25th and New York Streets, Wichita, in response to a complaint by an employee that hazardous materials (paint sludges) were being improperly disposed of on the property. I met with Mr. Gene Stamm, General Manager, and we inspected an area located at the southwest corner of the facility. In that area a large propane tank had been cut in half lengthwise and was observed to contain paint sludge and some rainwater. On the ground around the tank was a large amount of grey paint sludge covering an area approximately 25 feet in diameter.

My interview with Mr. Stamm indicated that the sludge was material being returned to Reid Supply after solvent recovery by Ameron, Inc., at Andover. The sludge contained an excess of liquid and was not suitable for disposal so the company was pouring it into the tank in an effort to separate the liquid portion. The process did not function as planned and resulted in the large amount of spillage.

I indicated to Mr. Stamm that the sludge should be cleaned up and barreled and that the company should seek another appropriate method to solve the problem. He agreed and indicated that corrective action would be taken.

I revisited the facility on December 31, 1980, and found that the spilled material had been placed in barrels along with a large amount of dirt. The tank was no longer present on the premises and the general area was satisfactorily cleaned up. The sludge/dirt mixture is contained in 13 barrels stored near the spill area. These barrels do not have lids and should be properly disposed of.


Michael J. Everhart
Environmental Quality Coordinator

MJE/jk

RECEIVED

JAN 7 1981

BUREAU OF ENVIRONMENTAL
SANITATION

7

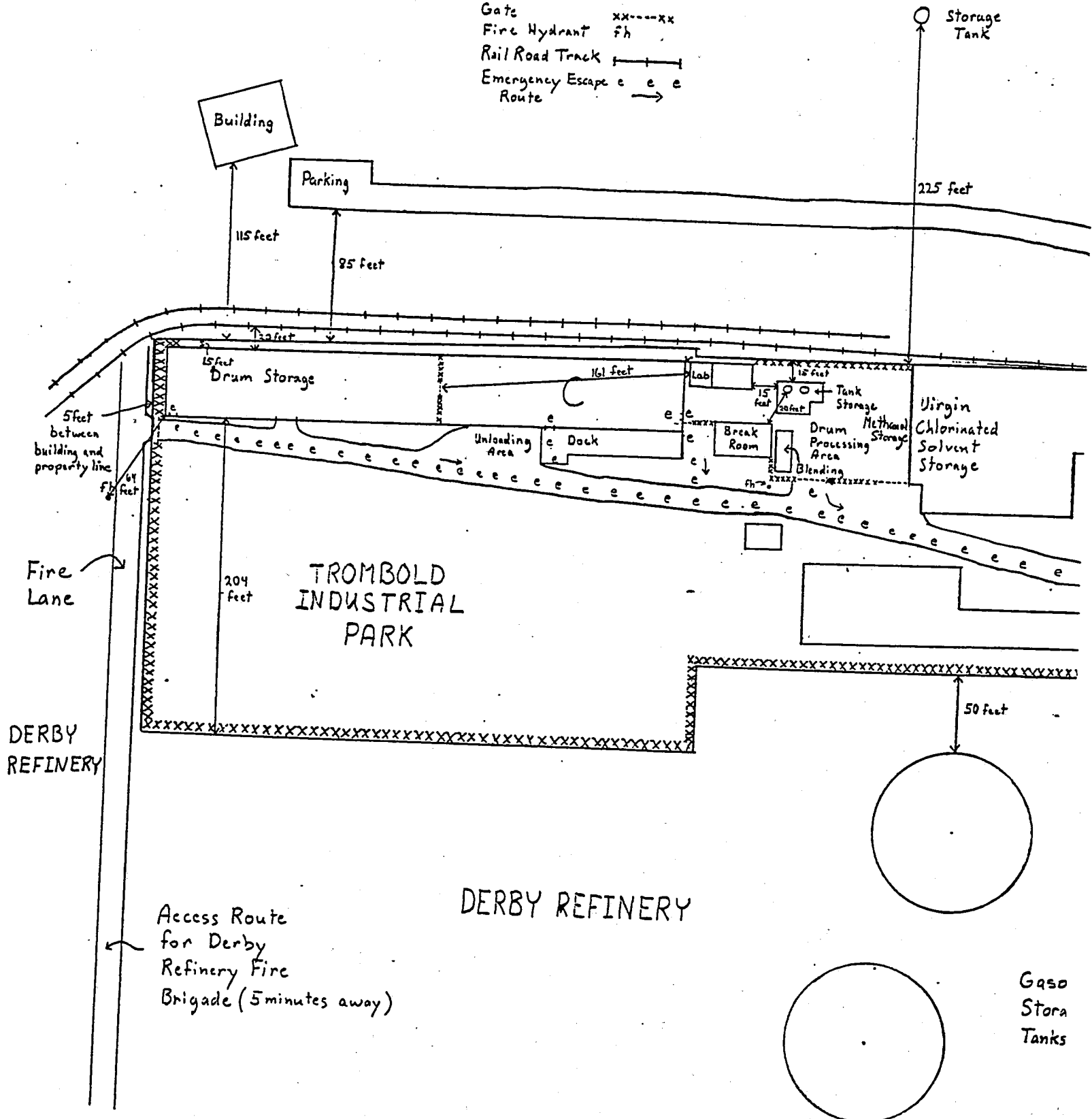


86 feet
1 inch

MISSOURI

Legend

- Barrier Fence xxxxxxxx
- Gate xx---xx
- Fire Hydrant fh
- Rail Road Track —+—+—+—
- Emergency Escape Route e e e





Barbara J. Sabol, Secretary

State of Kansas . . . John Carlin, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

News Release

Forbes Field
Topeka, Kansas 66620
913-862-9360



Release Date: IMMEDIATELY
6/22/84

News Contact: Bob Moody
Extension 263

Reid Supply Company, 2549 North New York, Wichita, has been assessed a \$7,000 fine by the Kansas Department of Health and Environment for violations of laws regulating the storage of hazardous waste.

An April inspection by staff members of KDHE and the U.S. Environmental Protection Agency found a number of instances of noncompliance at the industrial chemical supply and recycling facility. On the day of the inspection, approximately 1,300 drums of hazardous waste were stored on site pending recycling, reclamation, or disposal. The maximum process design capacity for the facility is 500 drums.

Additionally, drums containing hazardous wastes were stored in deteriorated condition; some drums were leaking at the time of the inspection or had leaked prior to the inspection. Hazardous waste drums were not stored with adequate spacing to provide for the inspection of each drum and were stored in an unsafe manner. Hazardous wastes which are incompatible were found to be stored adjacent to each other. The inspectors also determined that adequate security was not provided for all drums of hazardous waste stored at the facility as evidenced by drums stored outside covered and fenced storage areas.

Dr. Allan Abramson, Director of Environment, in issuing the fine also ordered Reid Supply Company to correct all violations noted in the inspection. Storage practices which provide for individual inspection of drums and eliminate unsafe conditions must be implemented by July 1.

(more)

REID SUPPLY ORDER
MOODY

Additionally, all deteriorating or damaged drums must be removed from the facility by July 1 and the number of drums in storage must be reduced to no more than 500 by July 15.

Reid Supply Company officials have met with KDHE staff and have expressed their desire to work cooperatively to correct all violations. The order assessing the fine is subject to appeal.

State of Kansas . . . ROBERT F. BENNETT, Governor

DEPARTMENT OF HEALTH AND ENVIRONMENT

DWIGHT F. METZLER, Secretary

Topeka, Kansas 66620



April 11, 1978

DIRECTIVE

The Reid Supply Company
911 East Indianapolis
Wichita, Kansas 67211

ATTENTION: Mr. Gene Stamm

Gentlemen:

Certified Mail No. 243146

An inspection of your facility located at 2600 New York Avenue in Wichita was conducted on April 4, 1978. This inspection revealed that your firm is disposing of waste by-products in the following manner:

1. Waste solvent and still bottom sludge is diverted under your facilities fence to a hand dug trench which empties in a small drainage channel adjacent to your plant property.
2. Still bottom sludge is dumped on the roofs of surrounding buildings.
3. Acid repackaging rinse water pit is discharged to aforementioned drainage channel adjacent to your plant property.

Since you have no permit to dispose of wastes in this manner all three of these actions are in violation of K.S.A. 1976 Supp. 65-3409 which states, "It shall be unlawful for any person, city, county, other political subdivision or state agency to dump or deposit, or permit the dumping or depositing of any solid wastes onto the surface of the ground or into the waters of the state without having obtained a permit as required by K.S.A. 1976 Supp. 65-3407, as amended."

In accordance with the provisions of K.S.A. 1976 Supp. 65-3411 of the state statutes, a copy of which is enclosed, you are hereby officially notified of this violation of K.S.A. 1976 Supp. 65-3409 and are directed to:

1. Immediately cease all dumping of wastes into the adjacent creek, the area surrounding your plant, or onto the roofs of nearby buildings.

The Reid Supply Company
Page 2
April 11, 1978

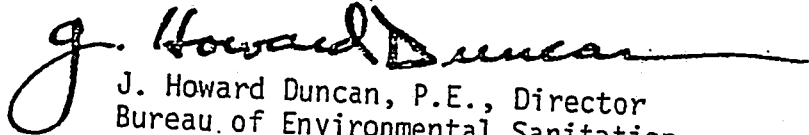
2. All wastes are to be safely stored on site until a disposal procedure is approved by the department.
3. Submit a written proposal which outlines how each of these waste materials will be properly disposed in the future. This report is to be submitted by May 1, 1978.

You should be aware that amendments to K.S.A. 1976 Supp. 65-3409 make violations of the Solid Waste Management Act, the regulations adopted thereunder and orders issued pursuant to the Act a class A misdemeanor. Additionally, the department may impose civil penalties up to five hundred dollars (\$500) per day for violations of the Act.

If you have any questions concerning these requirements please contact me at 913-862-9360.

Sincerely yours,

Division of Environment


J. Howard Duncan, P.E., Director
Bureau of Environmental Sanitation

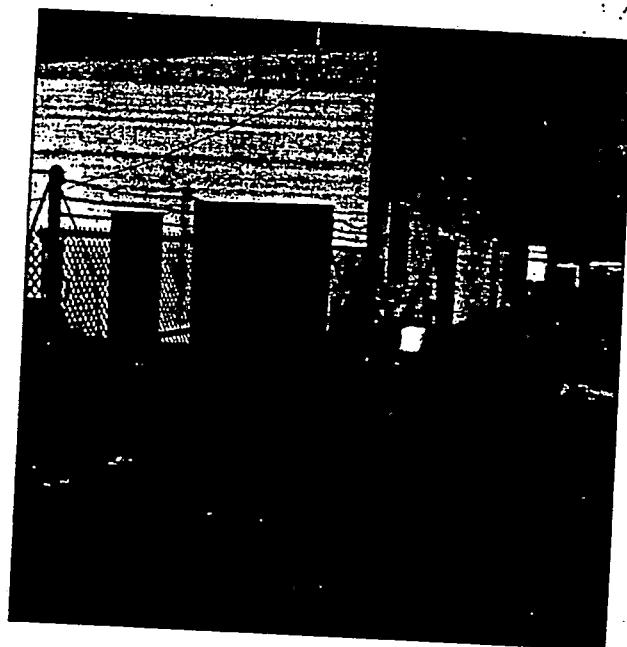
mw

cc: South Central District - Wichita
Jim Aiken

SW#77-23

Reid Supply Co. - Wichita
April 4, 1978

Unpermitted Discharge of
Still Bottom and Solvent
Residue



GENERAL INFORMATION

- Reid Supply has split up into three subcompanies. Service Chemical markets and packages industrial chemicals. Reid Supply handles textile chemicals. Conservation Services is now the branch of the firm handling hazardous wastes. Six employees are dedicated to this branch.
- Business has grown and they now have at least 160 waste customers. Much of this growth is due to dry cleaners.
- 75-80% of waste recieved is paint related.
- Waste materials that cannot be blended are sent to U.S.P.C.I. for landfilling.
- NCR's waste is currently being incinerated.
- Waste water soluble oils and lubricants are new wastestreams being picked up. These are sent to a water soluble treatment unit at Hydrocarbon Recyclers in Tulsa. Oil-based lubricants and cutting oils are blended for burning at Systech.
- Steam condensate from the sparging unit is included in the water-based wastestream (which includes water soluble oil), sent to HRI. This water is not considered by CSI to be hazardous.
- Chlorinated solvents, water soluble oils, and other water-based streams are the only wastestreams sent to Hydrocarbon Recyclers.
- Recovered perchloroethylene from Conservation Service's sparging unit is still being sold to Apparelmasters (a uniform supply company in Wichita). Perc still bottoms are blended for Systech fuel. The filter cartridges are thrown in the dumpster after sparging.
- Wastes generated from Conservation Service's own operations include: sparged dry cleaning carbon, and bottoms from the distillation unit.
- Waste solvent is filtered prior to recycling. A contaminated filter cake may be generated from this operation from time to time in the future.
- The sparged carbon has 2% perc. CSI does not consider it to be hazardous, although it is blended in fuel to Systech.
- About 9 drums of fly ash are recieved from Systech every 90 days. This waste is 25% organics and 75% kiln dust. It is sent for landfilling at U.S.P.C.I.
- Non-chlorinated waste solvent is either recycled on-site or blended for fuel.
- A U.S.P.C.I. gondola is present on-site at all times, in the staging area. Solidified waste paint is dumped from drums into the gondola.
- It is no longer policy to send stratified water (from drums or elsewhere) as low BTU waste for deep well injection well. It is now sent to Hydrocarbon Recyclers.
- Manifest discrepancies: a customer sent them five drums listed as containing paint thinner on the manifest, but which actually were found to contain 1,1,1 trichloroethane. This was worked out with the customer, and Conservation ended up processing the drums.

OVER

FIELD OBSERVATIONS

Staging area

- Warning and no smoking signs were present.
- Looked inside U.S.P.C.I. gondola, saw paint sludge and some standing liquid. Dave said the gondola was inspected weekly, and that any free liquid was absorbed prior to shipment.
- There were approximately 193 drums in the staging area. Some of these were empty and some were partially filled. I estimate less than 20 were empty. The drums were not being stored in any systematic manner and in a couple of areas were bunched together in a way that made it difficult to check condition of each drum (refer to attached pictures). Dave told me inspections are not conducted of the drums in this area, because they were only stored one or two days. I recommended he conduct inspections anyway.
- Several of the drums were rusted.
- Drums of fly ash from Systech were marked "Hazardous Waste Solid, n.o.s.", but were not marked ORME-E.
- There was approximately 3" of an unidentified oily residue in a cut open 10 gallon plastic drum. Dave told me later this was actually caustic soda.
- There was an open drum full of solvent directly under one of the vertical storage tanks. It was apparently there to catch drips from a leaky valve.
- A full drum placed west of the western vertical tank was severely dented and not marked with a start date.

Warehouse "C"

- Approximately 537 drums of hazardous waste were in this facility.
- Several dented drums
- Several rusted drums
- Several drums lacking start dates

[only a few of the drums were stacked, and these were stacked two high]

Still area, lab, sparging unit, and warehouse area

- The old lab chemicals were gone. Dave said they'd been disposed of through U.S.P.C.I. I was told the liquids were blended in with solvent and shipped to Systech, and the solids went to U.S.P.C.I. (they were placed in the gondola).
- Outside, in temporary storage, were: 3 drums of sparged carbon (these were not labeled and had no start dates); 19 drums of sparged perc to be sold to Apparelmasters; 3 drums of cartridges to be sparged on-site (these were not marked with start dates); and 28 drums of solvent to be distilled,

from Kansas Paint and Color (one drum severely dented).

Dave said no routine inspections were conducted of the drums stored in this area. I again recommended he do so.

FINDINGS AND PROBLEMS

- 1) EPA waste code D001 was used on the manifests for shipment of blended solvent to Systech. The waste should actually be considered F005, since Mr. Trombold stated over 10% of F005 constituents would be present.
- 2) Waste analysis plan needs to be updated to include water soluble oil.
- 3) A non-certified lab, Heuristech (Wichita), is being used to runs some of the verification analyses. They run halogen content, and BTU's with a bomb calorimeter.
- 4) They were missing the previous weeks inspection logs. Mr. Trombold felt he had these, but could not find them.
- 5) "Time" was missing on some of the weekly container inspection logs.
- 6) Mr. Trombold could not find records of the latest annual personnel training review.
- 7) An operating record was needed, showing the quantity and location of each hazardous waste within the facility.
- 8) Need to include the staging area and the still area in their weekly container inspections.
- 9) Rusted drums in warehouse "C" and the staging area.
- 10) Dented drums in warehouse "C", the staging area, and the still area.
- 11) Better aisle space needed in the staging area.
- 12) Drums of fly ash in staging area should be marked "ORM-E".
- 13) Unidentified oily residue in plastic drum at staging area.
- 14) Open drum of waste solvent under one of vertical storage tanks.
- 15) Drums not marked with start dates in warehouse "C", the staging area, and in the still area.
- 16) Approximately 730 drums of hazardous waste total at the facility. This is over the max inventory stated in the permit application.

(Revisited 10/13/86. At that time, total hazardous waste drum inventory was approximately 475. Also, items #'s 2, 4, 5, 6, 7, 11, and 13 had been taken care of.)

Table 2-4. Analytical Results for Volatile Organic Compound Concentrations in Ground Water Samples Taken From Existing Wells in the Vicinity of HRI.

Volatile Organic:	Detection	Concentration (ug/l):									
	Limit (ug/l)	HRI-2** (ug/l)	HRI-3** (ug/l)	RSC-1** (ug/l)	UPR-1* (ug/l)	UPR-2* (ug/l)	DRB-1* (ug/l)	DRB-2* (ug/l)	DRB-3* (ug/l)	DOM-1*** (ug/l)	DOM-2*** (ug/l)
Chloromethane	5.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromomethane	1.2	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Vinyl Chloride	0.8	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Chloroethane	3.7	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Methylene Chloride	0.9	ND	2.6	ND	66.0	27.0	ND	ND	ND	ND	ND
1,1-Dichloroethene	0.6	ND	26.5	ND	365.0	18.0	ND	ND	1.2	ND	ND
1,1-Dichloroethane	0.5	ND	4.4	ND	86.0	15.0	ND	ND	191.0	ND	ND
trans &/or cis 1,2-Dichloroethene	0.5	ND	76.4	1.7	ND	18.0	ND	ND	91.0	ND	ND
Chloroform	0.5	ND	147.0	17.5	15.0	ND	ND	4.9	53.0	ND	ND
1,2-Dichloroethane	0.6	ND	ND	ND	59.0	ND	ND	1.5	ND	ND	ND
1,1,1-Trichloroethane	0.7	ND	122.0	ND	4755.0	97.0	0.6	ND	ND	14.9	ND
Carbon Tetrachloride	0.7	ND	635.0	84.4	ND	ND	ND	ND	960.0	ND	ND
Bromodichloromethane	0.5	ND	ND	ND	ND	ND	ND	17.0	ND	ND	ND
1,2-Dichloropropane	0.4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
trans 1,3-dichloropropane	0.8	ND	ND	ND	ND	ND	ND	ND	2.5	ND	ND
Trichloroethene	0.6	8.1	6260.0	16.5	ND	13.0	2.1	ND	450.0	ND	ND
Benzene	0.4	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Dibromochloromethane	0.7	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
cis 1,3-Dichloropropane	0.9	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	0.6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Bromoform	1.5	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	0.6	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND
Tetrachloroethene	1.1	ND	504.0	2.6	ND	26.0	ND	ND	ND	ND	ND
Toluene	0.4	ND	0.9	0.9	190.0	151.0	ND	ND	78.0	ND	ND
Chlorobenzene	0.4	ND	ND	ND	ND	ND	ND	ND	ND	1.0	ND
Ethylbenzene	0.7	ND	ND	ND	ND	11.0	ND	ND	ND	ND	ND
meta-Xylene	0.6	ND	ND	15.1	ND	ND	ND	ND	ND	ND	ND
ortho &/or para-Xylene	0.6	ND	ND	23.1	250.0	214.0	ND	ND	ND	2.1	ND
1,3-Dichlorobenzene	1.0	ND	ND	ND	ND	ND	ND	ND	ND	2.0	ND
1,2 &/or 1,4-Dichlorobenzene	1.0	ND	ND	ND	ND	ND	ND	ND	ND	ND	ND

Key - HRI-1 - Monitoring Well Utilized by Hydrocarbon Recyclers, Inc.
 DRB-1 - Monitoring Well by Derby Refinery, 1980-1983
 UPR-1 - Monitoring Well Installed by Union Pacific on Former SCSC Property
 DOM-1 - Domestic Well
 ND - Not Detected

* Well screened at or within 5 ft. of the water table
 ** Well screened within 5 ft. of the base of the aquifer
 *** Screened depth unknown

Source: "Wichita North Industrial District, Phase I - Part I - Initial Site Assessment". HWS Technologies Inc. February 24, 1989. and KDHE GC/MS Analysis Reports for Ground Water Samples Collected May 21, 1987. Lab Nos. 7037440, 50, & 60.

2013



1. PROCESS AREA STORAGE TANKS
2. WASTE BLENDING AND DRUM PROCESSING
3. FORMER DRUM PROCESSING AREA
4. PROCESS AREA TRUCK BAY
5. SPARGING AREA
6. HOT ROOM
7. ELEVATED TANK STORAGE AREA
8. NONREGULATED WASTE STORAGE AREA
9. SOLIDS DRYER AREA
10. DRUM CRUSHER
11. CRUSHED DRUM ROLL-OFF BOXES
12. WARM ROOM
13. DOCK AREA
14. DRUM STORAGE WAREHOUSE (BUILDING C)
15. CORROSIVE WASTE STORAGE AREA
16. DRY SOLIDS GONDOLA
17. LABORATORY SAMPLE STORAGE AREA
18. VEHICLE FUELING TANKS
19. OPEN AREA ALONG SOUTHWEST CORNER
20. BUILDING J
21. BUILDING I
22. CONCRETE VAULT
23. OPEN AREA NORTH OF BUILDING I

SOURCE: FACILITY MAP FOR HYDROCARBON
RECYCLERS INC. PREPARED BY
N REISS & GOODNESS ENGINEERS.



NO SCALE

FIGURE 2-2
SITE PLAN AND
FACILITY LAYOUT
HRI FACILITY
RCRA FACILITY ASSESSMENT

John Paul Gartz
Chuck Lind
Reid file

CC

BEFORE THE KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT

In The Matter Of The Possession Of
Radioactive Materials And Hazardous
Wastes By The Reid Supply Company Of
Wichita, Kansas

RECEIVED

Case No. 80 APR 7 1980

BUREAU OF ENVIRONMENTAL
SANITATION

O R D E R

The Secretary of the Department of Health and Environment, Joseph F. Harkins, now considers the captioned matter. The Secretary's files reflect that his staff members made an inspection and appraisal of the premises of the Reid Supply Company (Reid) offices located at 911 East Indianapolis, and the operational facility located at or about 25th and New York Streets, Wichita, Kansas, on March 25, 1980. The Secretary's staff interviewed the person in charge of the premises, Mr. H. C. "Turk" Humann, made observation of the premises, took samples from the content of barrels and other materials, and performed chemical analysis of certain materials.

The Secretary has in hand the results from the field analysis as well as the laboratory analysis of the specimens taken from the site.

The Secretary makes the following findings of fact:

1. There are approximately 3,000 barrels of waste solvents at the Reid site. There are no markings or other labels on the said barrels.
2. Several of the 3,000 barrels contain radioactive materials, including radium 226.
3. At the Reid premises, there is a machine, known as a "solvent still" used for the reclaiming of contaminated solvents; the solvent still has been used in the past, is presently being repaired, and is intended to be used in the future to process waste materials on site in the said barrels.
4. The residue materials from the solvent still, described as "still sludges" have been disposed of throughout the operational premises of the Reid site in Sedgwick County. Such disposal presents a potential health hazard to workers at the Reid site and persons near the area for the reason that such materials may be ingested either through hand-to-mouth or windblown or air-borne contact.

-2-

The Secretary takes notice of the provisions of K.A.R. 28-35-175, which provides as follows:

"No person shall receive, use, possess, transfer, or dispose of radioactive material except as authorized in a specific or general license issued pursuant to these regulations, or as otherwise provided in these regulations. Authority to transfer possession or control by the manufacturer, producer, or processor of any equipment, device, commodity, or other product containing source, or by-product materials whose subsequent possession, use, transfer, and disposal by all other persons are exempted from regulatory requirements may be obtained only from the United States nuclear regulatory commission, Washington, D.C. 20555."

The Secretary concludes that the Reid Supply Company is in violation of K.A.R. 28-35-175 because it does not have a license issued by the Secretary, has not been exempted by the United States Nuclear Regulatory Commission, and has received, used, possessed, transferred or disposed of radioactive materials.

The Secretary concludes that Reid is operating a hazardous waste storage and processing facility, within the meaning and scope of K.S.A. 1979 Supp. 65-3402(1), and the Secretary's files further reflect that Reid does not have a permit for operation of same, in accordance with K.S.A. 1979 Supp. 65-3407(b), which provides as follows:

"After June 30, 1977, in the state of Kansas, it shall be unlawful for any person to construct, alter or operate a hazardous waste processing facility or storage or disposal area of a hazardous waste management system without first obtaining a permit from the secretary."

The Secretary takes notice of K.A.R. 1979 Supp. 28-29-41(a) which provides as follows:

"No person shall store, transport, or accept for processing or disposal a hazardous waste that is not marked and labeled in compliance with this regulation and other applicable state and federal laws."

The Secretary finds that Reid has accepted for transport hazardous wastes which are not marked or labeled and therefore Reid is in violation of K.A.R. 1979 Supp. 28-29-41.

-3-

The Secretary determines, based on the above findings, and conclusions that the storage, transportation, treatment, and disposal of wastes by the Reid Supply Company may present an eminent and substantial hazard to the health of persons or to the environment; the Secretary determines that it will be necessary for him to take action, within the meaning and scope of K.S.A. 1979 Supp. 65-3419(f) to protect the health of such persons and the environment.

IT IS THEREFORE ORDERED BY THE SECRETARY that the Reid Supply Company:

1. Hold and contain all waste materials, including solvents, barrels or other containers and waste sludges, now in its possession and on its operational premises. Such materials are not to be processed, transported or otherwise handled until decontamination methodologies and disposal procedures have been approved in writing by the Director of the Division of Environment of the Kansas Department of Health and Environment.
2. Submit to the Director of the Division of Environment, within 15 days of receipt of this order, a written proposal indicating the procedures to be used, in regard to storage of the materials described in 1., to assure that there will be no unauthorized removal of waste materials from the Reid premises; such procedures shall also address and provide assurances that Reid will protect against loss, leakage or dispersion of materials, specifically including the occurrence of fire or water damage. Reid shall take all reasonable and necessary steps to prevent removal, loss, leakage or dispersion pending the written approval by the Director of the Division of Environment.
3. Shall submit to the Director of the Division of Environment, within fifteen (15) days of receipt of this order, a proposal for the method to be used, and the location

-4-

- thereof, of the disposal, if any, of the disassembled solvent still and its components, further, Reid shall indicate the manner and place of disposal of any components previously removed.
4. Submit to the Director of the Division of Environment, within thirty (30) days of receipt of this order, a written proposal describing procedures to be used for identification of all barrels, equipment and materials which contain radioactive materials; said proposal shall include the type of equipment to be used for such determination and the qualification of personnel conducting such procedures.
 5. Shall submit to the Director of the Division of Environment, within thirty (30) days of receipt of this order, a proposal containing detailed survey of radioactive materials which are, or may be, on or about the premises of the Reid site, including buildings, building interiors, building roofs, and roadways. The proposal shall provide for cleanup techniques, and may be in accordance with the attached document entitled "Contamination Limits for Facilities Using Radium."
 6. Shall submit to the Director of the Division of Environment, within thirty (30) days of receipt of this order, all records and other documentation indicating shipments by Reid of waste solvents or reprocessed solvents, or other materials transported by Reid, since the time when Reid first began receiving solvents.
 7. Shall submit, within sixty (60) days of receipt of this order, to the Director of the Division of Environment, documentation indicating the origin of all solvents on the Reid premises; such documentation shall provide specific information regarding those solvents which contain radioactive

-5-

8. Shall take a complete inventory of the contents of all drums containing waste materials, and this inventory shall be completed in a written report detailing same submitted to the Director of the Division of Environment, within ninety (90) days of receipt of this order.
9. Shall submit a written proposal to the Director of Environment, within ninety (90) days of receipt of this order, detailing procedures and methods to be used for the disposal or transfer of all radioactive material now in the possession or Reid; the disposal or transfer of radioactive material shall not take place until such time as the Director has approved the procedure for such disposal or transfer, and in addition, Reid has obtained all necessary and required permits for storage, transportation and disposal of such materials.


IT IS FURTHER ORDERED BY THE SECRETARY that the Reid Supply Company shall cease and desist from receiving, transporting, storing or reprocessing waste materials, except as provided above in this order, until such time as the appropriate permits and licenses have been obtained by Reid, in compliance with:

1. K.S.A. 48-1607 (Licensing, registration, possession and use of sources of radiation and records thereof),
2. K.A.R. 28-35-175 (cited and quoted above),
3. K.S.A. 1979 Supp. 65-3407(b) (Construction, alteration or operation of solid or hazardous waste processing facility or disposal area without permit unlawful; permits; fees; conditions; denial, suspension or revocation of permits),
4. K.A.R. 1979 Supp. 28-29-48 (Transportation of hazardous waste),
5. K.A.R. 1979 Supp. 28-29-44 (Storage of hazardous waste; permit required),


6. K.A.R. 1979 Supp. 28-29-55 (Hazardous waste processing facilities).

If the Reid Supply Company is aggrieved by this order, it may file a written request, for administrative hearing, with the Secretary of the Department of Health and Environment, within thirty (30) days of receipt of this order.

IT IS BY THE SECRETARY SO ORDERED.


Joseph F. Harkins, Secretary
Kansas Department of Health and
Environment

Approved as to legality and form:

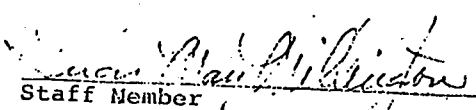

Jack Shelton, Attorney
The Special Assistant
Kansas Department of Health and
Environment
Forbes Field, Bldg. 740
Topeka, Kansas 66620
(913) 862-9360

CERTIFICATE OF PERSONAL SERVICE

I hereby certify that I delivered a copy of the above and foregoing Order to _____ at the location of _____ on the _____ day of April, 1980.

CERTIFICATE OF MAILING

I hereby certify that on the 17th day of April, 1980, a true and correct copy of the foregoing Order was mailed to Mr. H. C. "Turk" Humann, 911 East Indianapolis, Wichita, Kansas 67211 by depositing the same in a properly addressed envelope postage prepaid, certified mail, return receipt requested in the U.S. mail.


Staff Member

Certified No. 2806899

Reid Supply Company of Wichita
Order

-7-

ACKNOWLEDGMENT OF RECEIPT

I hereby acknowledge that I have received a copy of the
above and foregoing Order.

Date: _____

Name _____

Title: _____

of the Reid Supply Company.

Conservation
Services Inc.
Wichita

STATE DEPARTMENT OF HEALTH AND ENVIRONMENT
Division of Environment
Bureau of Environmental Remediation

C-1(JPG): Tom

prior to a mtg w/Reid
i/or Derby, pls set up
a mtg w/you, me, Tom &
JP to discuss

Dennis

MEMORANDUM

DATE: November 12, 1986

TO: Larry Knoche

FROM: Ralph E. O'Connor *Ralph E. O'Connor*

SUBJECT: Groundwater Contaminates Moving Off-Site From
Reid Supply Company On To Derby Refining Company Property

The volatile organic compound analysis from MW1, MW2 and MW3 for Derby Refinery on their quarterly reports seems to indicate movement of solvents and other organics from Reid Supply Company onto Derby Refining Company.

I would suggest that, if possible, we set up a meeting between Reid, Derby and KDHE to discuss this matter and procedures for dealing with the problem.

At this same meeting, or separately if you think best, we need to discuss with Derby the need for development of a cleanup program for VOC's from the groundwater.

MW#4 is showing 21 ug/l carbon tetrachloride and 15 ug/l trichloroethene; MW#6 is showing 36 ug/l vinylchloride, 130 ug/l trans-1,2-dichloroethane, 4.9 ug/l trichloroethene and 2.0 ug/l benzene; MW#7 is showing 32 ug/l trans-1,2-dichloroethane, 618 ug/l benzene, 88 ug/l toluene, 101 ug/l ethylbenzene and 96 ug/l total xylenes. We now have no zero line as all monitor wells are polluted to some degree.

REO:ba

cc: Dennis Murphy
File

RECEIVED

NOV 13 1986

BUREAU OF
ENVIRONMENTAL
REMEDIATION

TOPEKA, KANSAS 66620
GC/MS ANALYSIS REPORT

REPORT TO: RALPH O'CONNOR
ADDRESS: 3244 E. DOUGLAS, WICHITA, KS. 67208

LAB NUMBER: 7019450C
REPORT DATE: 12-17-86

SAMPLE COLLECTION INFORMATION

SAMPLE IDENTIFICATION NUMBER: DRW02
COLLECTION SITE: DERBY REF. MONITOR WELLS
COLLECTED BY: R.E. O'CONNOR

SAMPLE TYPE: WATER
SEDGWICK CO.
DATE: 11-24-86
TIME: 1243

RESULTS OF ANALYSIS

PURGABLE ORGANICS	CONCENTRATION (UG/L)	DETECTION LIMIT (UG/L)
CHLOROMETHANE	NOT DETECTED	5.0
BROMOMETHANE	NOT DETECTED	1.2
VINYL CHLORIDE	NOT DETECTED	0.8
CHLOROETHANE	NOT DETECTED	3.7
DICHLOROMETHANE	NOT DETECTED	0.9
1,1-DICHLOROETHYLENE	NOT DETECTED	0.6
1,1-DICHLOROETHANE	NOT DETECTED	0.5
TRANS &/OR CIS 1,2-DICHLOROETHYLENE	NOT DETECTED	0.5
TRICHLOROMETHANE (THM)	4.9	0.5
1,2-DICHLOROETHANE	NOT DETECTED	0.6
1,1,1-TRICHLOROETHANE	NOT DETECTED	0.7
TETRACHLOROMETHANE	17.0	0.7
BROMODICHLOROMETHANE (THM)	NOT DETECTED	0.5
1,2-DICHLOROPROPANE	NOT DETECTED	0.4
TRANS 1,3-DICHLOROPROPENE	NOT DETECTED	0.8
TRICHLOROETHYLENE	NOT DETECTED	0.6
BENZENE	NOT DETECTED	0.4
DIBROMOCHLOROMETHANE (THM)	NOT DETECTED	0.7
CIS 1,3-DICHLOROPROPENE	NOT DETECTED	0.9
1,1,2-TRICHLOROETHANE	NOT DETECTED	0.6
BROMOFORM (THM)	NOT DETECTED	1.5
1,1,2,2-TETRACHLOROETHANE	NOT DETECTED	0.6
TETRACHLOROETHYLENE	NOT DETECTED	1.1
TOLUENE	NOT DETECTED	0.4
CHLOROBENZENE	NOT DETECTED	0.4
ETHYLBENZENE	NOT DETECTED	0.7
META-XYLENE	NOT DETECTED	0.6
ORTHO &/OR PARA-XYLENE	NOT DETECTED	0.6
1,3-DICHLOROBENZENE	NOT DETECTED	1.0
1,2 &/OR 1,4-DICHLOROBENZENE	NOT DETECTED	1.0

COMMENT: 1,2-DICHLORO-1,1,2-TRIFLUOROETHANE WAS DETECTED.

ANALYST: RICHARD L. PIERCE *RP*
COPY TO: LARRY KNOCH, FORBES BLDG 740

ROGER H. CARLSON, PH.D., DIRECTOR

KANSAS DEPARTMENT OF HEALTH AND ENVIRONMENT
LABORATORY SERVICES AND RESEARCH
ENVIRONMENTAL ORGANIC LABORATORY
TOPEKA, KANSAS 66620

GC/MS ANALYSIS REPORT

REPORT TO: RALPH O'CONNER
ADDRESS: 3244 E. DOUGLAS, WICHITA, KS. 67208

LAB NUMBER: 7019460C
REPORT DATE: 12-19-86



SAMPLE COLLECTION INFORMATION

SAMPLE IDENTIFICATION NUMBER: DRMWO3
COLLECTION SITE: DERBY REF. MONITOR WELLS
COLLECTED BY: R.E. O'CONNER

SAMPLE TYPE: WATER
SEDGWICK CO.
DATE: 11-24-86

TIME: ****

RESULTS OF ANALYSIS

PURGABLE ORGANICS	CONCENTRATION (UG/L)	DETECTION LIMIT (UG/L)
CHLOROMETHANE	NOT DETECTED	5.0
BROMOMETHANE	NOT DETECTED	1.2
VINYL CHLORIDE	NOT DETECTED	0.8
CHLOROETHANE	NOT DETECTED	3.7
DICHLOROMETHANE	NOT DETECTED	0.9
1,1-DICHLOROETHYLENE	231	0.6
1,1-DICHLOROETHANE	157	0.5
TRANS &/OR CIS 1,2-DICHLOROETHYLENE	99.8	0.5
TRICHLOROMETHANE (THM)	NOT DETECTED	0.5
1,2-DICHLOROETHANE	NOT DETECTED	0.6
1,1,1-TRICHLOROETHANE	1410	0.7
TETRACHLOROMETHANE	NOT DETECTED	0.7
BROMODICHLOROMETHANE (THM)	NOT DETECTED	0.5
1,2-DICHLOROPROPANE	NOT DETECTED	0.4
TRANS 1,3-DICHLOROPROPENE	NOT DETECTED	0.8
TRICHLOROETHYLENE	1020	0.6
BENZENE	0.5	0.4
DIBROMOCHLOROMETHANE (THM)	NOT DETECTED	0.7
CIS 1,3-DICHLOROPROPENE	NOT DETECTED	0.9
1,1,2-TRICHLOROETHANE	NOT DETECTED	0.6
BROMOFORM (THM)	NOT DETECTED	1.5
1,1,2,2-TETRACHLOROETHANE	NOT DETECTED	0.6
TETRACHLOROETHYLENE	179	1.1
TCLUENE	0.5	0.4
CHLOROBENZENE	NOT DETECTED	0.4
ETHYLENEBENZENE	NOT DETECTED	0.7
META-XYLENE	NOT DETECTED	0.6
ORTHO &/OR PARA-XYLENE	NOT DETECTED	0.6
1,3-DICHLOROBENZENE	NOT DETECTED	1.0
1,2 &/OR 1,4-DICHLOROBENZENE	NOT DETECTED	1.0

ANALYST: RICHARD L. PIERCE *RLP*

ROGER H. CARLSON, PH.D., DIRECTOR

COPY TO: LARRY KNOCH, FORBES BLDG 740

RECOVERY OF WASTE SOLVENT FLOW CHART

(East Lot Sketch Attached)

RECEIVED

MAY 23 1980

I. EAST LOT

BUREAU OF ENVIRONMENTAL
SANITATION

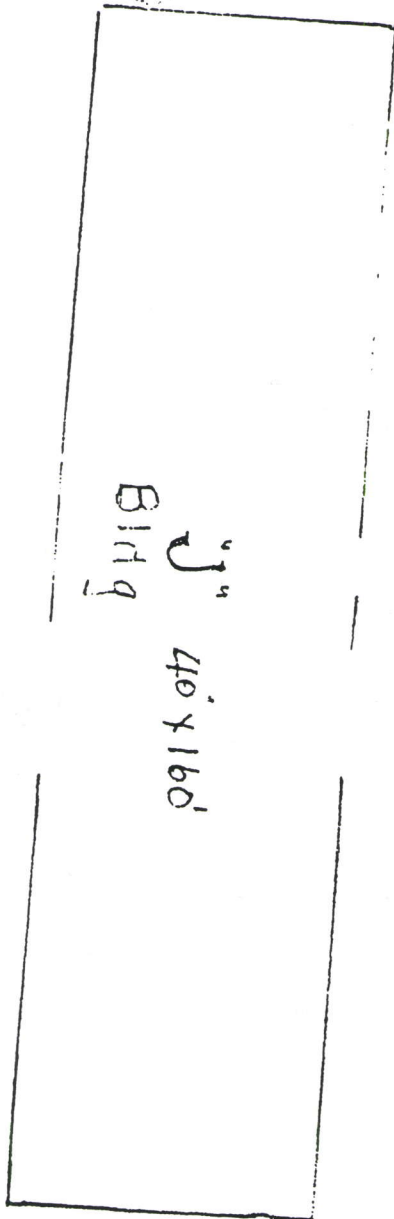
The distillation processing steps are carried out in the West end and involve the facilities immediately outside, on the West. The inside areas house the laboratory, boiler room and still room. The outside facilities are used to prepare solvents for distillation and to temporarily store the recovered solvents, and withdraw the semi-solid and solid waste sludges. The processing is done using the following steps:

- A. Transfer waste solvent to the "separator tank" "F". The capacity of this tank is 700 gallons. The solution is permitted to settle a minimum of 3 hours. Water and/or semi-solid materials are separated by gravity.
- B. Solvents are transferred by gravity, through a wire mesh screen into tank "E". The capacity of this tank is 150 gallons. This tank is set on the edge of a "spill-pit".
- C. The filtered solvents is transferred to storage tank "D". The capacity of this tank is 550 gallons. This provides more than 1 day's distillation capacity.
- D. The stored solvent is transferred by gravity to tank "A", the still-feed tank. The capacity of this tank is 150 gallons. This tank sets in larger dimension steel tank to provide spill protection.
- E. From tank "A" the solvent is pumped into the still. The still is used as a batch type facility. The operator fills

the still, monitoring the level via an over-flow valve.

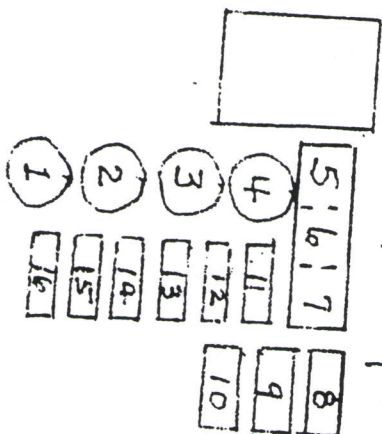
- F. The operator takes note of the recovered solvent to determine the termination of the batch-distillation process. The volume of recovery is predetermined by laboratory analysis of the material being distilled. The recovered solvent is then pumped into storage tanks "B" and "C". The capacity of each tank is 500 gallons. From the storage tanks it is transferred into new steel drums and stored in building "J".
- G. 'Sludge Treatment. The still is provided with rotating scrapers in order to prevent solid build up on the sides and bottom. When removed the consistency varies from semi-solid to solid type sludge. The semi-solid sludge is further processed in a solid sludge still where heat and steam drive out the solvents that the recovery process was unable to evaporate all residual solvents.
- H. The sludge is then transferred to 55 gallon steel drums and stored for disposal to the Furley facility.

EAST LOT

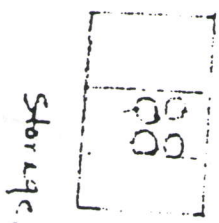
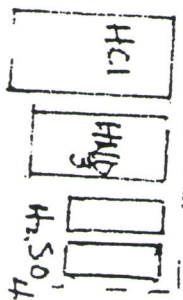
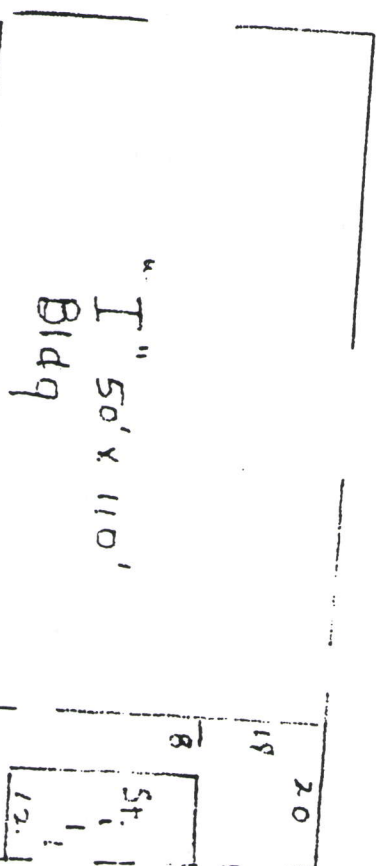


- TANKS
- A - Still feed
 - B - Storage
 - C - Storage
 - Recovered Solvent
 - D - Storage - still feed
 - P - Pump
 - E - Final Filter
 - E - Separator - Gravity

Bulk Storage



1-4 = 5000 gal ea.
 5-7 = 3500 gal. ea.
 8-10 = 1500 gal. ea.
 11-16 = 500 gal ea.



- A
- B
- C
- D
- E
- F



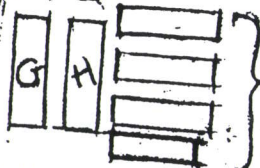
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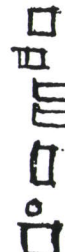
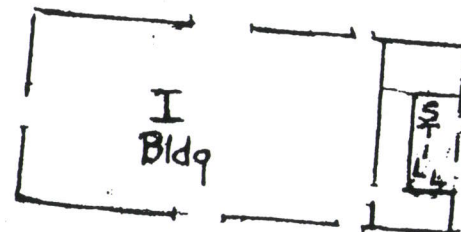
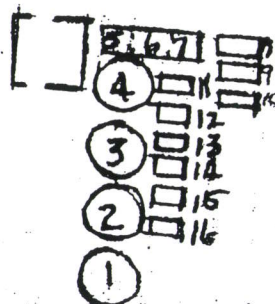
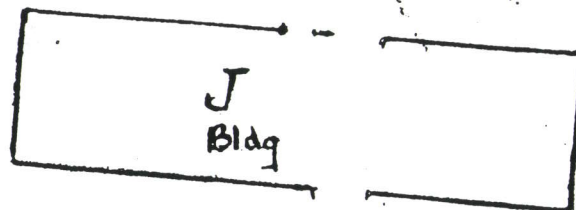
(Bulk Storage)
EAST LOT

New York

Waste
Solvent
Storage

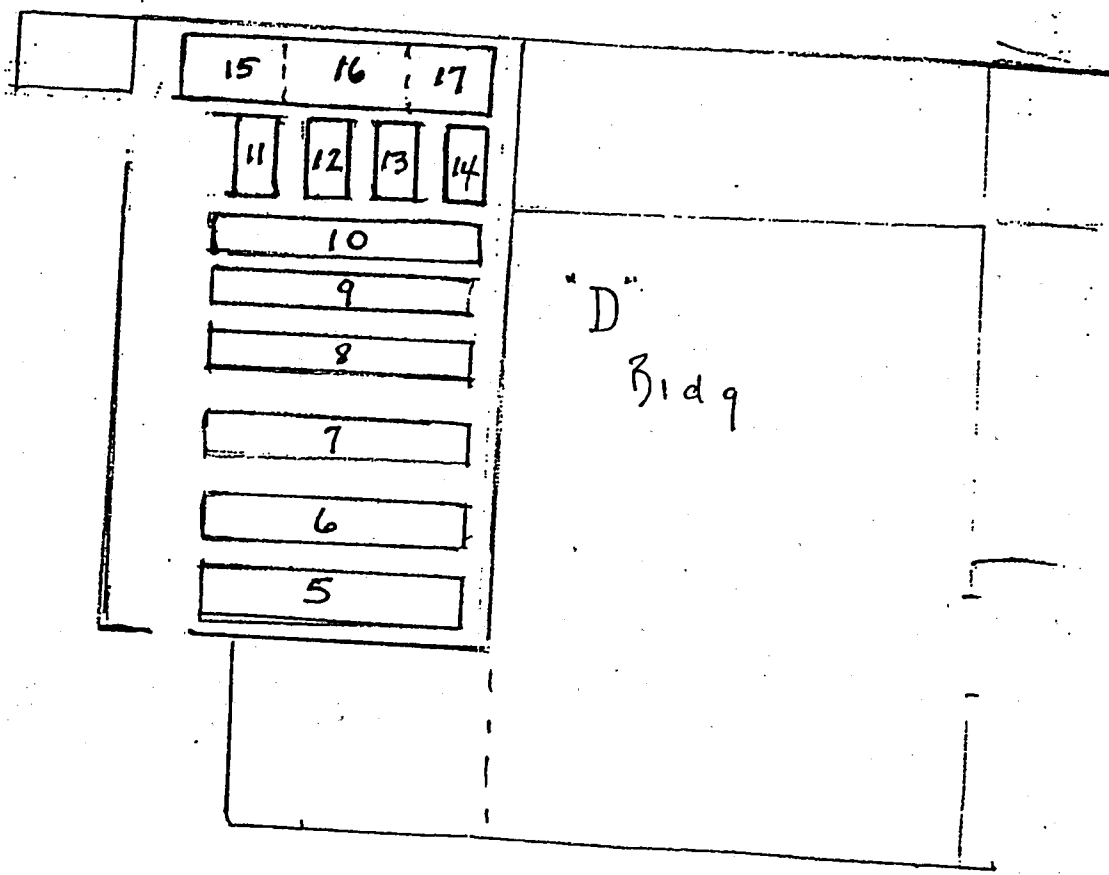


H_2SO_4



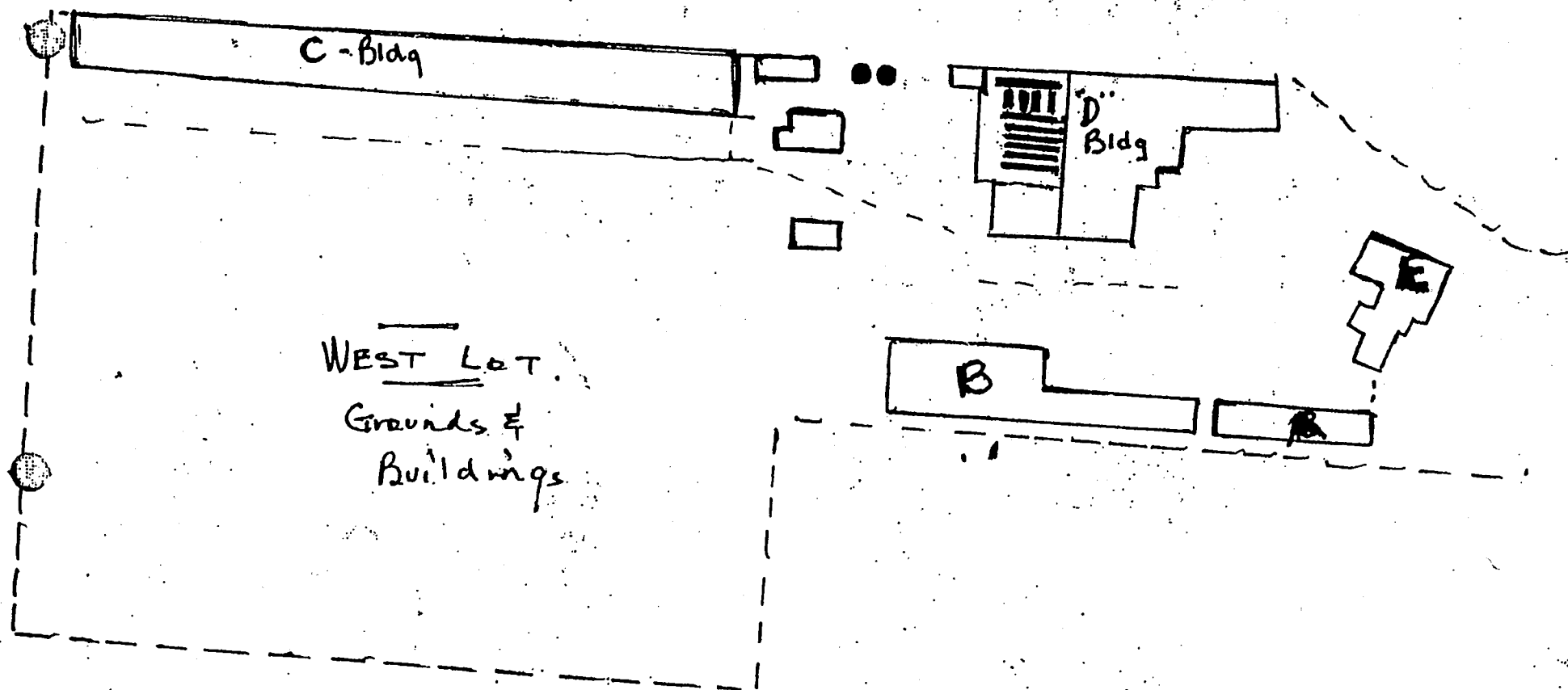
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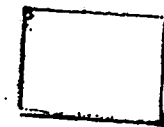
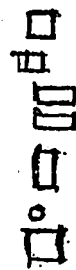
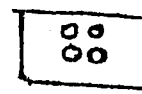
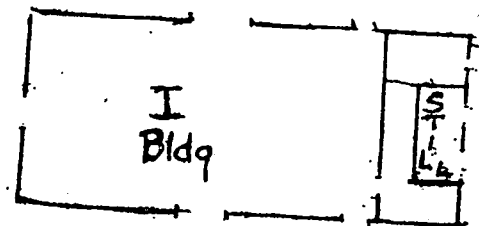
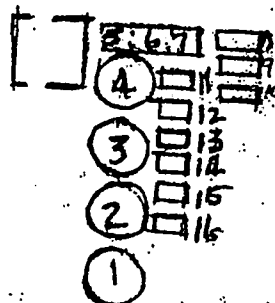
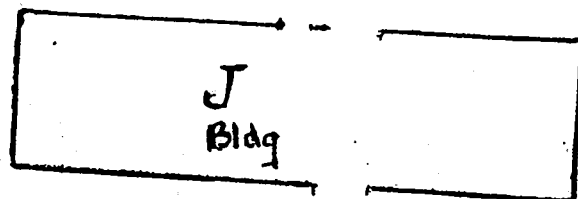


25th St

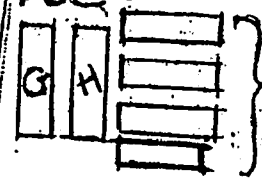
5

(Bulk Storage)
EAST LOT

New York



White Solvent Storage



H₂SO₄



FACILITY MAP

DGT 8/16



1 inch = 115 feet

Legend

Barrier Fence xxxx

Gate xx---xx

Fire Hydrant fh

Rail Road Track ---+---+---

Emergency Escape Route e e e e e

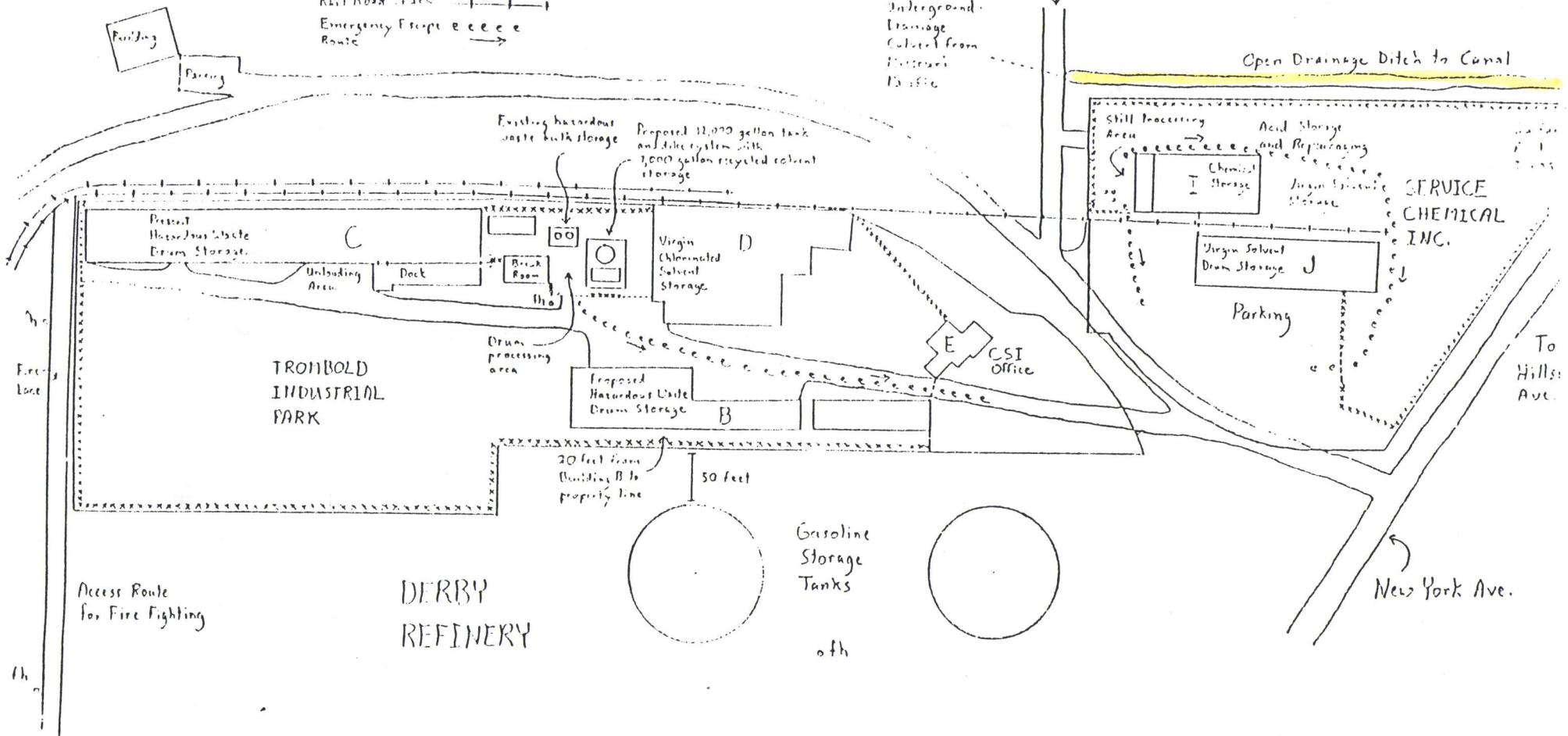
○ Storage Tank

MISSOURI PACIFIC

To Missouri Pacific Truck Terminal

Underground Drainage Culvert from Missouri Pacific

Open Drainage Ditch to Canal



DEPARTMENT OF HEALTH AND ENVIRONMENT

M E M O R A N D U M

To: Reid Supply, Wichita File

From: Deborah Helstrom

Subject: Inspection

Date: January 31, 1980

I spoke with Mr. Stamm, the manager, and Mr. Thumann, the engineer. They told me that they still consider this a pilot project. Their home-made solvent recovery still produces approximately one barrel of sludge per 10 barrels of solvent. They put the sludge in a cooker and produce a very dry crumbly sludge. At peak production they reported that they can process 3 barrels of solvent a day. When it is too cold, such as the day I made my visit, they cannot run the still. They have accumulated around 20 barrels of sludge in one year of operation. They have used some for road fill and roofing.

They have hundreds of barrels of unprocessed solvent, stacked outside on unpaved ground. Many are rusting, however, I didn't see any leaking. They are still accepting used solvent. Their present policy is to only accept solvent which the customer will buy back from them.

They told me their main business is packaging and sale of acids and that they may not continue the solvent recovery business.

DH:vld